

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED
LATICIA EVANS	:	VIOLATIONS: 18 U.S.C. § 1343 (wire fraud – 2 counts) 18 U.S.C. § 1028A(a)(1)(aggravated identity theft – 2 counts)

I N D I C T M E N T

COUNTS ONE AND TWO

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Target Corporation (“Target”) was a retail corporation headquartered in Minneapolis, Minnesota, that did business in interstate and foreign commerce and operated a chain of brick-and-mortar stores as well as selling merchandise on-line via Target.com. Subject to application approval, Target offered credit card services to its customers under the trademark name “RedCard.”
2. TD Bank, N.A., (“TD Bank”) was a financial institution headquartered in Cherry Hill, New Jersey, the deposits of which were insured by the Federal Deposit Insurance Corporation, Certificate Number 18409. TD Bank issued and serviced Target RedCards and did business in interstate and foreign commerce.
3. Target and TD Bank allowed Target customers to apply for instant credit in Target retail stores by completing electronic applications for the issuance of new Target RedCards. All electronic applications for new Target RedCards were transmitted electronically via wire communication from the Target Retail store location at which the customer completed the application to one of two Target data centers located in Minnesota.

THE SCHEME

4. In or about December 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

LATICIA EVANS

knowingly devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

5. Defendant LATICIA EVANS and co-schemers known and unknown to the Grand Jury acquired stolen means of identification and personal identity information (“PII”), including names, dates of birth, social security numbers, driver’s license numbers, and addresses, of persons (hereinafter the “Victims”) located in the Eastern District of Pennsylvania and elsewhere.

6. Defendant LATICIA EVANS took passport photos of herself at a CVS store.

7. Defendant LATICIA EVANS and co-schemers known and unknown to the grand jury then used the photos of defendant EVANS in combination with stolen means of identification and PII to create counterfeit driver’s licenses in the names of the Victims but containing defendant EVANS’ photograph, including one purported to have been issued by the Commonwealth of Pennsylvania to Victim J.S. and another one purported to have been issued by the State of New Jersey to Victim F.G.

8. One or more of the co-schemers drove defendant LATICIA EVANS to different retail stores and other merchants, including retail stores and merchants located in

Lancaster and Berks Counties, Pennsylvania, so that defendant EVANS could pose as the Victims to try to obtain instant credit from the merchants in order to purchase merchandise.

9. Defendant LATICIA EVANS used the counterfeit drivers' licenses and other means of identification of the Victims to apply for instant credit in the names of the Victims at various merchants, including Target, Apple, Staples, and Kohl's, so that defendant EVANS and other co-conspirators could purchase merchandise and services from the merchants that would be charged to the credit accounts of the Victims.

10. Defendant LATICIA EVANS caused the merchants, including Target, to transmit instant credit applications in interstate commerce via the internet to their data processing centers and to the lenders servicing the merchants' credit cards, and caused the merchants and lenders to send notice of acceptance or denial for credit to Victims via U.S. Mail documenting the applications for credit made by defendant EVANS.

11. On or about December 13, 2019, at a Target retail store in Berks County, Pennsylvania, defendant LATICIA EVANS used the means of identification of Victim F.G., including a counterfeit drivers' license in Victim F.G.'s name but containing defendant EVANS' photograph, to complete an electronic instant credit application in an attempt to obtain a Target RedCard issued by TD Bank so that defendant EVANS could use it to obtain store merchandise, all without Victim F.G.'s knowledge and consent. In so doing, defendant EVANS completed an electronic application using a portable electronic device into which defendant EVANS input Victim F.G.'s PII, which then was transmitted in interstate commerce through the computer networks belonging to Target to a Target data center in Minnesota.

12. On or about December 24, 2019, at a Target retail store in Lancaster County, Pennsylvania, defendant LATICIA EVANS used the means of identification of Victim

J.S., including a counterfeit drivers' license in Victim J.S.'s name but containing defendant EVANS' photograph, to complete an electronic instant credit application in an attempt to obtain a Target RedCard issued by TD Bank so that defendant EVANS could use it to obtain store merchandise, all without Victim J.S.'s knowledge and consent. In so doing, defendant EVANS completed an electronic application using a portable electronic device into which defendant EVANS input Victim J.S.'s PII, which then was transmitted in interstate commerce through the computer networks belonging to Target to a Target data center in Minnesota.

WIRE FRAUD

13. On or about each of the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant

LATICIA EVANS

alone and with co-schemers known and unknown to the Grand Jury, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count:

COUNT	DATE	ORIGIN OF WIRE	DESTINATION OF WIRE	METHOD OF WIRE AND DESCRIPTION
ONE	December 13, 2019	Target Retail Store, Berks County, Pennsylvania	Target Data Center, Minnesota	Electronic application for a Target RedCard in the name of Victim F.G., completed by defendant LATICIA EVANS
TWO	December 24, 2019	Target Retail Store, Lancaster County, Pennsylvania	Target Data Center, Minnesota	Electronic application for a Target RedCard in the name of Victim J.S., completed by defendant LATICIA EVANS

All in violation of Title 18, United States Code, Section 1343.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

LATICIA EVANS

knowingly and without lawful authority, possessed and used a means of identification of another person, that is, the name, date of birth, social security number, and address, of F.G., during and in relation to wire fraud, in violation of Title 18, United States Code, Section 1343, as charged in Count One of the Indictment.

In violation of 18 U.S.C. § 1028A(a)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 24, 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

LATICIA EVANS

knowingly and without lawful authority, possessed and used a means of identification of another person, that is, the name, date of birth, social security number, address, and driver's license number of J.S., during and in relation to wire fraud, in violation of Title 18, United States Code, Section 1343, as charged in Count Two of the Indictment.

In violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL:

GR

Ronald Sarach for

**WILLIAM M. McSWAIN
UNITED STATES ATTORNEY**

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

LATICIA EVANS

INDICTMENT

Counts

18 U.S.C. § 1343 (wire fraud – 2 counts);
18 U.S.C. § 1028A(a)(1)(aggravated identity theft – 2 counts)

A true bill
[Redacted]

Foreman _____

Filed in open court this _____ day,
Of _____ A.D. 20_____

Clerk

Bail, \$ _____